

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF WEST VIRGINIA

Martinsburg Division

UNITED STATES OF AMERICA

v.

JONATHAN TOEBBE and  
DIANA TOEBBE,

Defendants.

Case No. 3:21-MJ-138

**MOTION TO UNSEAL**

Now comes the United States of America and Randolph J. Bernard, Acting United States Attorney for the Northern District of West Virginia by Jarod J. Douglas, Assistant United States Attorney, and moves the Court to unseal the case in the above-referenced matter for the reason that the arrest warrants have been executed and the fact of the investigation is now known to the targets of the investigation. As such, the integrity of the investigation will not be compromised by the unsealing of the case.

WHEREFORE, the United States moves the Court to unseal the case.

Respectfully submitted,

UNITED STATES OF AMERICA,  
RANDOLPH J. BERNARD  
ACTING UNITED STATES ATTORNEY

/s/ Jarod J. Douglas

Jarod J. Douglas  
Assistant United States Attorney